

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Hadia A Ahmed  
Debtor

Chapter 13  
Bankruptcy No. 19-12588-elf

LoanCare, LLC, or its Successor or Assignee  
Movant

vs.

WILLIAM C. MILLER, Esq., Trustee  
Hadia A Ahmed  
Respondents

**LOANCARE, LLC NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO  
THE COVID-19 PANDEMIC**

Now comes Creditor LoanCare, LLC ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 4 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 08/01/20 through 11/01/20. Creditor holds a secured interest in real property commonly known as 31 Millbourne Avenue, Upper Darby, Pennsylvania 19082 as evidenced by claim number 3 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 12/01/20 and will be required to cure the delinquency created by the forbearance period (hereinafter "forbearance arrears"). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

/s/ Ann E. Swartz, Esquire  
MARGARET GAIRO, ESQUIRE ID # 34419  
ANN E. SWARTZ, ESQUIRE ID #201926  
LAUREN M. MOYER, ESQUIRE ID # 320589  
JOHN M. KOLESNIK, ESQUIRE ID # 308877  
Attorney for LoanCare, LLC

123 South Broad Street, Suite 1400  
Philadelphia, PA 19109  
Telephone: (215) 790-1010  
Facsimile: (215) 790-1274  
Email: [ecfmail@mwc-law.com](mailto:ecfmail@mwc-law.com)